

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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|------------------------------|---|------------------------------------|
| JOSEPH D'ALESSANDRO and OLGA | : | C.A. No. 1:06-cv-548-GMS |
| D'ALESSANDRO, | : | |
| | : | |
| Plaintiffs, | : | REQUEST FOR ENLARGEMENT |
| | : | OF TIME TO ANSWER OR |
| v. | : | OTHERWISE PLEAD PURSUANT TO |
| | : | RULE 12 |
| PROGRESSIVE NORTHERN | : | |
| INSURANCE COMPANY, | : | |
| | : | ELECTRONICALLY FILED |
| Defendant. | : | |

Defendant Progressive Northern Insurance Company hereby requests that the Clerk enter an Order for Enlargement of Time for Defendant to answer or otherwise respond to the Plaintiffs Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure. Defendant is in the process of filing a Motion to Dismiss based on the Plaintiffs failure to state a cause of action against Defendant upon which relief may be granted.

WHEREFORE, defendant Progressive Northern Insurance Company requests the Clerk to enter an enlargement of time to answer or otherwise plead pursuant to Rule 12 of the Federal Rules of Civil Procedure.

By: /s/ Michael I. Silverman
Michael I. Silverman, Esquire
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Dated: May 16, 2007

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOSEPH D'ALESSANDRO and OLGA
D'ALESSANDRO,

Plaintiffs,

v.

PROGRESSIVE NORTHERN
INSURANCE COMPANY,

Defendant.

:
: C.A. No. 1:06-cv-548-GMS
:
:
: **REQUEST FOR ENLARGEMENT OF**
: **TIME TO ANSWER OR OTHERWISE**
: **PLEAD PURSUANT TO**
: **RULE 12**
:
:
: **ELECTRONICALLY FILED**
:

PROPOSED ORDER

AND NOW, this _____ day of _____, 2007, upon Application for
Enlargement of Time of Default Judgment and Time for Defendant to answer or otherwise
respond to the Plaintiffs Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure,
it is hereby **ORDERED** that the Defendant has _____ days to Answer the Complaint.

BY THE COURT:

J.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOSEPH D'ALESSANDRO and OLGA
D'ALESSANDRO,

Plaintiffs,

v.

PROGRESSIVE NORTHERN
INSURANCE COMPANY,

Defendant.

C.A. No. 1:06-cv-548-GMS

**REQUEST FOR ENLARGEMENT
OF TIME TO ANSWER OR
OTHERWISE PLEAD PURSUANT TO
RULE 12**

ELECTRONICALLY FILED

CERTIFICATE OF SERVICE

This is to certify that on May 16, 2007, a copy of the foregoing Request for an Order for Enlargement of Time to Answer or Respond on behalf of the Defendant Pursuant to Rule 12 of the Federal Rules of Civil Procedure was filed electronically.

I hereby certify that on May 16, 2007, two true and correct copies of the foregoing Request for Order of Enlargement of Time to Answer or Otherwise Plead Pursuant to Rule 12 of the Federal Rules of Civil Procedure was served by U.S. first class mail, postage prepaid, upon the following:

Joseph D'Alessandro and Olga D'Alessandro
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